



January 18, 2019

Central Coast Regional Water Quality Control Board
Attn: John Robertson, Executive Officer
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906
AgNOI@waterboards.ca.gov

RE: Comments pertaining to Ag Order 4.0 Options Tables

Dear Chair Wolff and Members of the Board:

As an association representing farmer-owned businesses in California, I write in regard to the Central Coast Regional Water Quality Control Board's development of Ag Order 4.0, including the conceptual regulatory requirement options tables released in November. Ag Council is concerned the regulatory concepts proposed by staff will negatively affect farming operations.

The proposed conceptual regulatory requirement options are overly burdensome, improper, inconsistent with State Water Board directives and policies, and do not take into account the unique cropping patterns within the Central Coast. The regulatory requirement options will have a severe impact on agricultural operations in the Central Coast. Ag Council is particularly concerned about the following:

- Improper numeric limits;
- Pesticide application restrictions;
- Riparian buffer requirements and prohibition of removal of existing native riparian vegetative cover; and
- Requirements contradict the State Water Board's precedential elements with the East San Joaquin Order

The result of these requirements will inevitably lead to increased compliance costs for administration and reporting and disrupt ongoing and existing efforts and practices to protect water quality. Rather than creating a new and improper regulatory structure that is not compatible with technical, social, and economic constraints of irrigated lands in our region, the Central Coast Water Board should work with agricultural stakeholders as soon as possible to develop reasonable options different from those in the regulatory requirement options tables that are consistent with the State Water Board's direction as well as the Court of Appeals decision.

Thank you for considering Ag Council's perspective.

Sincerely,

A handwritten signature in blue ink that reads "Tricia Geringer". The signature is fluid and cursive, with the first name "Tricia" being more prominent than the last name "Geringer".

Tricia Geringer
Vice-President of Government Affairs
Agricultural Council of California